

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE APPLICATION OF MAKHPAL
KARIBZHANOVA FOR JUDICIAL
ASSISTANCE PURSUANT TO 28 U.S.C.
§ 1782**

**Case No. 21-mc-00442
ECF Case**

**DECLARATION OF MAKHPAL KARIBZHANOVA IN SUPPORT OF THE
OPPOSITION TO VLADISLAV KIM'S MOTION TO INTERVENE
AND MODIFY BANK SUBPOENAS AND FOR A PROTECTIVE ORDER**

Makhpal Karibzhanova, pursuant to 28 U.S.C. § 1746, declares the following:

1. I am citizen of Kazakhstan and permanently reside in New York, New York.
2. I am fully familiar with the facts set forth herein and make this Declaration on the basis of my own personal knowledge.
3. I make this Declaration in support of my opposition to the motion to intervene and to quash subpoenas and for a protective order filed by Vladislav Kim ("Kim") on September 5, 2021.¹ ECF No. 39.
4. I met Kim around 1997. Kim worked under Aidan at Kazkommerts Securities, a subsidiary of Kazkommertsbank, where Aidan was managing director. For about twenty years we socialized and had innumerable conversations together. I discussed Aidan's business with Kim and Aidan and was present when Kim and Aidan (and others) discussed their business together. Since at least 2001, I have known known Kim as someone who manages Aidan's interests (and the interests of others) and serves as Aidan's nominee.

¹ Kim filed a "corrected" motion on September 7, 2021, and a related affidavit on September 8, 2021.

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5. In 2001, Aidan founded Visor Group and brought Kim on as an employee. I have been with Aidan and Kim on countless occasions when the two of them discussed their business ventures. When Aidan reduced his ownership share in Visor, Kim stepped in to act as his nominee. It was always apparent from their conversations that Aidan was the boss and Kim did as he was told.

6. Visor is an investment company formed under the laws of the British Virgin Islands ("BVI"). Visor is located at 77/7 Al-Farabi, 12th Floor, Almaty, Kazakhstan. The 12th Floor of the 77/7 Al-Farabi building is the address of the Kazakh headquarters for Aidan's various businesses. I know that Aidan has control of the 12th and 14th floors. I have been to the 12th and 14th floors on numerous occasions for my own business meetings (with Aidan's permission) and sat in on meetings between Aidan and the many people who serve his business interests. I know from my personal time at the office that Aidan operates certain of his other businesses from the 12th and 14th floor of 777 Al-Farabi.

7. I know and believe that assets and investments of Visor Group were held through complex offshore trusts and holding companies, including those entities which Kim holds as nominee for Aidan ("Subject Entities").

8. I believe that the Subject Entities, and many others, were used by Aidan and Kim to obscure the ownership of Visor's assets and profits. As part of that obfuscation, I believe that Kim acted as a nominee for Aidan. I believe these entities were utilized for the covert dispersion of my and Aidan's marital assets.

9. On September 26, 2021, I filed a petition in the Supreme Court of the Republic of Kazakhstan appealing decisions issued by the Medeu District Court and Almaty City Court dismissing my case for equitable division of the marital assets.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 27, 2021.
New York, New York



Makhpal Karibzhanova